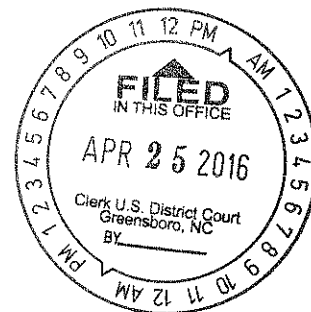


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :  
 :  
 v. : 1:16CR\_140\_-1  
 :  
 KUO HSIUNG YANG :  
 :  
 :

The Grand Jury charges:

COUNT ONE

From on or about February 24, 2015, continuing up to and including on or about March 4, 2015, the exact dates to the Grand Jurors unknown, in the County of Orange, in the Middle District of North Carolina, KUO HSIUNG YANG did knowingly receive any child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

COUNT TWO

On or about November 12, 2015, in the County of Orange, in the Middle District of North Carolina, KUO HSIUNG YANG did knowingly possess material which contained child pornography, as defined in Title 18, United States Code, Section 2256(8)(A),

that involved a prepubescent minor and a minor who had not yet attained 12 years of age, and which had been shipped, and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and which was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

#### FORFEITURE ALLEGATION


Upon conviction of one or more of the offenses alleged above, the defendant, KUO HSIUNG YANG, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a)(1) and (a)(3), all visual depictions described in Title 18, United States Code, Section 2252A, and all property, real or personal, used or intended to be used to commit or promote the commission of the offense of conviction, including but not limited to the following items that were obtained from defendant on or about November 12, 2015:

- a. One red Verbatim 16GB USB Drive, serial number B16G1617002432AML;
- b. One PNY solid state drive, serial number PNY21140000509332525;

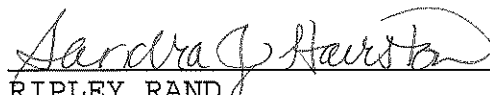
- c. One RaidMax custom mini-computer, serial number 1560033;
- d. One Seagate hard drive, serial number Z1F508K8;
- e. One Rosewill external USB/eSATA enclosure/Network Attached Storage device;
- f. One PNY 120GB solid state drive, serial number PNY17140000494052664;
- g. One Mini-Box computer labeled "Mini-Box PC";
- h. One Vizio TV monitor, Model E601I-A3;
- i. One Seagate 40GB hard drive, serial number 4MQ00AJX; and
- j. Thirteen 25GB Optical Quantum Blu-ray discs.

All in accordance with Title 18, United States Code, Section 2253, and Rule 32.2, Federal Rules of Criminal Procedure.

A TRUE BILL:

  
ERIC L. IVERSON  
ASSISTANT UNITED STATES ATTORNEY

FOREPERSON

for   
RIPLEY RAND  
UNITED STATES ATTORNEY